

**To:** Russ, Timothy[Russ.Tim@epa.gov]; Dresser, Chris[Dresser.Chris@epa.gov]; VanGessel, Benjamin[vangessel.benjamin@epa.gov]; Patulski, Meg[patulski.meg@epa.gov]  
**Cc:** Owen, Chris[Owen.Chris@epa.gov]; Bailey, Chad[bailey.chad@epa.gov]  
**From:** Berry, Laura  
**Sent:** Thur 12/22/2016 4:49:42 PM  
**Subject:** RE: I-70 East Project - Request to FHWA for Additional Information and Preliminary Comments/Observations

## Ex. 5 - Deliberative Process

Please cc Meg, Ben, and me on whatever you send – I can forward to Chris O/Chad, if you want to limit addressees.

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We appreciate your time in getting us this information as soon as possible, given we are within the 30 day comment period and several of us will be out of the office over the holidays.

Many thanks,

*Laura Berry*

(734) 214-4858

[berry.laura@epa.gov](mailto:berry.laura@epa.gov)

**From:** Russ, Timothy

**Sent:** Thursday, December 22, 2016 10:02 AM

**To:** Dresser, Chris <Dresser.Chris@epa.gov>; Berry, Laura <berry.laura@epa.gov>; VanGessel,

Benjamin <vangessel.benjamin@epa.gov>

**Cc:** Owen, Chris <Owen.Chris@epa.gov>; Bailey, Chad <bailey.chad@epa.gov>

**Subject:** RE: I-70 East Project - Request to FHWA for Additional Information and Preliminary Comments/Observations

Hi Everyone,

## **Ex. 5 - Deliberative Process**

## **Ex. 5 - Deliberative Process**

**Tue 3/5/2013 2:40 PM**

Russ, Timothy [Russ.Tim@epa.gov](mailto:Russ.Tim@epa.gov)

RE: I-70 East: Air Quality Coordination - Draft Air Quality Analysis (Revised 2/11/13): EPA Comments

EPA has reviewed the "Protocol Air Quality I-70East DEIS 11Feb13.pdf" (copy attached) and offers the following comments for your consideration (and apologies for not meeting the March 1<sup>st</sup> requested response date):

**A.) Section 3.1 Carbon Monoxide:** For CO hotspot modeling, the draft protocol indicates the following at the top of page 3:

“The conformity rule requires modeling of locations that are or will be at level of service D or worse. In the case of the I-70 project, this could be dozens of intersections. Because the project team is proposing to model only the worst-case location, the EPA Regional Administrator will need to approve this approach pursuant to 40 CFR §93.123(a)(1). Similar approval was sought and received for the streamlined approach used for CO hotspot modeling for the T-Rex project.”

Region 8 consulted with our Office of Transportation and Air Quality (OTAQ) and we have agreed that this approach is acceptable, as was done for the T-Rex project, for CO hotspot modeling for the I-70 East project. For reference, below is the FHWA-provided discussion from the T-Rex project and we have also provided a .pdf file of Region 8’s letter of May 3, 1999 on the issue (see: “990503 EPA SE Corridor AQ Approval.pdf”) – and thanks to CDOT for being able to produce this .pdf file. However, please be aware that a similar letter from Region 8’s Regional Administrator, with supporting technical information for the I-70 East Project, will be necessary:

#### **“Denver’s Southeast Corridor project**

This project involves the reconstruction and improvement of approximately 20 miles of I-25 and I-225 in the southeast portion of the Denver metro area. The project includes reconstruction and widening of the interstates, reconstruction of seven interchanges, replacement of 11 bridges, and construction of 19.7 miles of double-tracked light rail transit. The air quality scoping process for this project revealed that a literal application of the conformity rule’s hotspot modeling requirements (analysis of all locations at or expected to be at LOS D or worse) would necessitate modeling of 54 intersections. Modeling each of these locations for the 2008 opening day and the 2020 design year, for the Preferred Alternative and No-Action, and for a.m. and p.m. peak hours would have resulted in over 400 model runs.

In order to reduce the modeling workload, the Colorado Department of Transportation and its consultants worked through the interagency consultation process to identify an alternative analysis approach that would capture the worst-case intersections without the need for modeling all of them.<sup>32</sup> First, the project corridor was divided into two sections; a northern section, with high volumes and congestion, and a very narrow right-of-way bordered by residential development; and a southern section, with less congestion and a wider right-of-way. In the northern section, the four most congested interchanges were selected for modeling, for both 2008 and 2020. In the southern section, a “worst-case” interchange was selected for modeling, based on congestion, roadway geometry and traffic volumes. A single worst-case model run for this location combined 2008 CO emission rates with 2020 traffic volumes. As a further refinement, it was decided that only the Preferred Alternative in the EIS would be modeled initially; if this alternative did not result in violations of the CO NAAQS, the No-Action alternative would not be modeled. EPA’s Region 8 office in Denver approved this methodology in May 1999. Taken together, the refinements in this methodology are estimated to have reduced the modeling workload by 50 to 75%. No violations of the NAAQS for CO were predicted using the adopted screening procedure. *Southeast Corridor EIS Air Quality Analysis Technical Memorandum*, Carter & Burgess, June 1999.”

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[Suggested Comment:]

## **Ex. 5 - Deliberative Process**



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Once we have agreed on the content/form of the above requests and comment, I would then suggest that we send the requests/comment out from Region 8 (Tim volunteers) with "cc" to other EPA personnel.

Thoughts?

Thanks!

Tim

Tim Russ  
Environmental Scientist  
USEPA Region 8  
Air Program  
1595 Wynkoop Street (8P-AR)  
Denver, CO 80202-1129  
Ph. (303) 312-6479  
Fax (303) 312-6064  
e-mail: [russ.tim@epa.gov](mailto:russ.tim@epa.gov)

**From:** Dresser, Chris  
**Sent:** Wednesday, December 21, 2016 1:57 PM  
**To:** Berry, Laura <[berry.laura@epa.gov](mailto:berry.laura@epa.gov)>; Russ, Timothy <[Russ.Tim@epa.gov](mailto:Russ.Tim@epa.gov)>; VanGessel, Benjamin <[vangessel.benjamin@epa.gov](mailto:vangessel.benjamin@epa.gov)>  
**Cc:** Owen, Chris <[Owen.Chris@epa.gov](mailto:Owen.Chris@epa.gov)>; Bailey, Chad <[bailey.chad@epa.gov](mailto:bailey.chad@epa.gov)>  
**Subject:** RE: CO Moves files for EPA review

## Ex. 5 - Deliberative Process

Chris Dresser

U.S. EPA – Region 8

1595 Wynkoop Street

Denver, Colorado 80202-1129

Phone: (303) 312-6385

**From:** Berry, Laura  
**Sent:** Wednesday, December 21, 2016 1:53 PM  
**To:** Russ, Timothy <[Russ.Tim@epa.gov](mailto:Russ.Tim@epa.gov)>; Dresser, Chris <[Dresser.Chris@epa.gov](mailto:Dresser.Chris@epa.gov)>; VanGessel, Benjamin <[vangessel.benjamin@epa.gov](mailto:vangessel.benjamin@epa.gov)>  
**Cc:** Owen, Chris <[Owen.Chris@epa.gov](mailto:Owen.Chris@epa.gov)>; Bailey, Chad <[bailey.chad@epa.gov](mailto:bailey.chad@epa.gov)>  
**Subject:** FW: CO Moves files for EPA review

Hi all,

## Ex. 5 - Deliberative Process

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3. A decoder for which alternatives go with which AERMOD input/output file names

What else? Feel free to reply to all. Tomorrow I can write it up, or R8 can, and we can figure out who should send it... R8 can send w/ a cc to HQ, or we can send, whatever R8 prefers.

*Laura Berry*

(734) 214-4858

[berry.laura@epa.gov](mailto:berry.laura@epa.gov)

**From:** Dresser, Chris

**Sent:** Monday, December 19, 2016 10:30 AM

**To:** Horn, Chris (FHWA) <[Chris.Horn@dot.gov](mailto:Chris.Horn@dot.gov)>

**Cc:** Vanessa Henderson - CDOT <[vanessa.henderson@state.co.us](mailto:vanessa.henderson@state.co.us)>; Wallis, Carrie ([Carrie.Wallis@atkinsglobal.com](mailto:Carrie.Wallis@atkinsglobal.com)) <[Carrie.Wallis@atkinsglobal.com](mailto:Carrie.Wallis@atkinsglobal.com)>; Houk, Jeff (FHWA) <[Jeff.Houk@dot.gov](mailto:Jeff.Houk@dot.gov)>; Claggett, Michael (FHWA) <[Michael.Claggett@dot.gov](mailto:Michael.Claggett@dot.gov)>; Perritt, Karen (FHWA) <[Karen.Perritt@dot.gov](mailto:Karen.Perritt@dot.gov)>; Berry, Laura <[berry.laura@epa.gov](mailto:berry.laura@epa.gov)>; Russ, Timothy <[Russ.Tim@epa.gov](mailto:Russ.Tim@epa.gov)>

**Subject:** RE: CO Moves files for EPA review

Chris and Mike,

Could you also provide the scripts and/or intermediate tables that calculate the volume source emission rates from the MOVES output? It is important for us to understand how the cross-walk between MOVES links and AERMOD sources was performed.

Thanks,

-Chris

Chris Dresser

U.S. EPA – Region 8

1595 Wynkoop Street

Denver, Colorado 80202-1129

Phone: (303) 312-6385

**From:** Horn, Chris (FHWA) [<mailto:Chris.Horn@dot.gov>]

**Sent:** Sunday, December 18, 2016 8:51 AM

**To:** Dresser, Chris <[Dresser.Chris@epa.gov](mailto:Dresser.Chris@epa.gov)>; Russ, Timothy <[Russ.Tim@epa.gov](mailto:Russ.Tim@epa.gov)>

**Cc:** Vanessa Henderson - CDOT <[vanessa.henderson@state.co.us](mailto:vanessa.henderson@state.co.us)>; Wallis, Carrie ([Carrie.Wallis@atkinsglobal.com](mailto:Carrie.Wallis@atkinsglobal.com)) <[Carrie.Wallis@atkinsglobal.com](mailto:Carrie.Wallis@atkinsglobal.com)>; Houk, Jeff (FHWA) <[Jeff.Houk@dot.gov](mailto:Jeff.Houk@dot.gov)>; Claggett, Michael (FHWA) <[Michael.Claggett@dot.gov](mailto:Michael.Claggett@dot.gov)>; Perritt, Karen (FHWA) <[Karen.Perritt@dot.gov](mailto:Karen.Perritt@dot.gov)>

**Subject:** RE: CO Moves files for EPA review

Tim and Chris,

**Referred to FHWA**

Chris Horn, PE

Senior Area Engineer

Colorado Division

Federal Highway Administration

720-963-3017

**From:** Horn, Chris (FHWA)

**Sent:** Wednesday, November 23, 2016 8:41 AM

**To:** 'dresser.chris@epa.gov'; 'russ.tim@epa.gov'

**Cc:** 'Vanessa Henderson - CDOT'; Wallis, Carrie ([Carrie.Wallis@atkinsglobal.com](mailto:Carrie.Wallis@atkinsglobal.com)); Houk, Jeff (FHWA); Claggett, Michael (FHWA); Perritt, Karen (FHWA)

**Subject:** RE: CO Moves files for EPA review

Tim and Chris,

**Referred to FHWA**

Chris Horn, PE

Senior Area Engineer

Colorado Division

Federal Highway Administration

720-963-3017

**From:** Horn, Chris (FHWA)

**Sent:** Friday, November 18, 2016 10:47 AM

**To:** 'dresser.chris@epa.gov'; 'russ.tim@epa.gov'

**Cc:** 'Vanessa Henderson - CDOT'; Wallis, Carrie ([Carrie.Wallis@atkinsglobal.com](mailto:Carrie.Wallis@atkinsglobal.com)); Houk, Jeff (FHWA); Claggett, Michael (FHWA)

**Subject:** CO Moves files for EPA review

Chris and Tim,

# Referred to FHWA

Chris Horn, PE

Senior Area Engineer

Colorado Division

Federal Highway Administration

720-963-3017